

Exhibit E

DECLARATION OF ALISON PHILLIPS

Background

1. My name is Alison Phillips and I am a co-founder of The Human Trafficking Training Center (HTTC). The HTTC provides consultation services and training on human trafficking to law enforcement across the United States. Previously I served as the Director for the Anti-Human Trafficking Task Force for the Missouri Attorney General's Office. In that role, my job entailed facilitating and implementing a multi-disciplinary, comprehensive approach to addressing human trafficking in the state of Missouri; work that involved federal, state, county and local law enforcement, as well as regulatory, and social service agencies. Under my leadership, the Missouri Anti-Human Trafficking Task Force launched a first of its kind in the nation, strategy to address human trafficking in illicit massage businesses; named The Hope Initiative. This initiative achieved unprecedented success in closing IMB's within our state. It has been featured in multiple national forums and to date 23 other states have sought consultation looking to replicate the Hope Initiative. The HTTC at the request of INTERPOL in response the refugee crisis coming out of Ukraine, will also start several trainings in Europe. Through my work at the Missouri Attorney General's Office and at the HTTC, I have helped train hundreds of professionals to identify and respond to human trafficking.

2. Prior to my employment with the Attorney General's Office, I worked as an Adjunct Professor at the University of Missouri, Kansas City and Mid-America Nazarene University teaching courses on human trafficking to undergraduate criminal justice majors. I have worked as a consultant to churches and other community groups, helping them to plan effective and strategic efforts to combat human trafficking. In 2017, I obtained a Master's Degree in Criminal Justice and Criminology from the University of Missouri, Kansas City. In sum, I have over a decade of experience in the anti-trafficking field.

3. As part of my work, I have interviewed, worked with, advocated for and mentored hundreds of survivors of human trafficking. Many of them have shared with me personal details about the inhumane and horrific things that they have experienced; things that I will never forget. These stories and the resilience of those that have survived and carry on to build a new life for themselves motivate and inspire me to continue to fight.

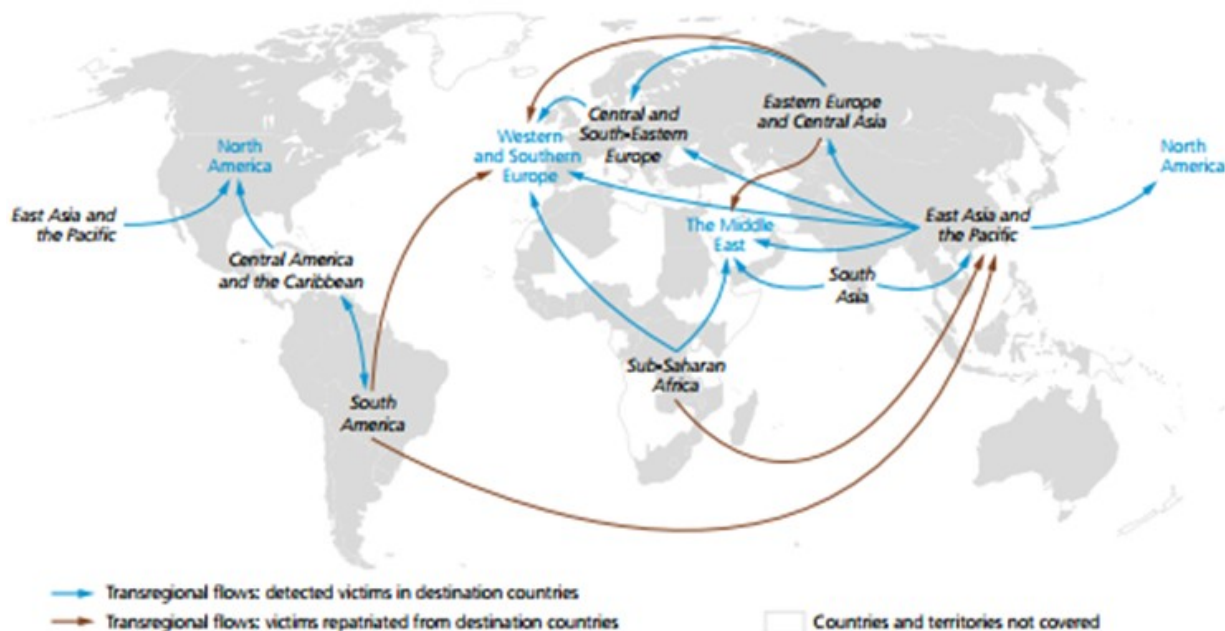
4. Part of my background in human trafficking work also originates from my experiences as a foster parent. Additionally, I am the proud mother of a daughter that my husband and I adopted internationally at the age four. Our adoption is the result of an intensive, three year process that we underwent before we could bring our daughter home. This was followed by another year before we were permitted to legally finalize her adoption. When we traveled to our daughter's birth country of India to bring her home, we were allowed to do so because an Indian court had granted us legal guardianship and we had obtained a Visa so that she could enter the United States. In order to finalize the adoption and for our daughter to become a U.S. citizen, we first submitted to a year's worth of social work visits and progress reports which were forwarded to India for their review and approval. We understood that all of this was to ensure that children brought into the U.S. for the purpose of adoption are protected from abuse and exploitation.

Human Trafficking on a Global Level

5. Recent estimates state that human trafficking is a \$150 billion dollar annual industry in which 40 million people around the world are currently victimized (International Labor Organization, 2014). Victims are trafficked for the purpose of forced labor, commercial sexual exploitation, using children as soldiers, begging, surrogacy, adoption and even organ harvesting. In financial terms, human trafficking is the second largest criminal enterprise on earth, following the illegal trade in drugs. Traffickers all around the world are increasingly recognizing the lucrative nature of human trafficking as it is relatively low risk when compared to the trade in illegal drugs, which requires extensive time and investment to manufacture, and high risk to transport and sell. Victims of human trafficking, on the other hand, can be easily obtained for little or no investment and can be sold repeatedly.

6. On a global scale, human trafficking victims are recruited and sold domestically within their own native country, but they are also moved via trans-regional flows that are influenced by “push and pull” factors. In so-called “origin countries,” government corruption, war, persecution, natural disasters, poverty, and organized crime create environments that in effect *push* victims out of their native country. Traffickers use financial rewards, opportunities to make money and the provision of basic needs to lure potential victims. Individuals from backgrounds of poverty and desperation are especially vulnerable to these offers. Traffickers capitalize on these circumstances of desperation and further exploit their victims’ vulnerabilities by creating situations of debt bondage and dependency. The affluence of “destination countries,” and the presence of demand for commercial sex and forced labor present a powerful economic *pull* that influence the flow of victims from one country to another.

■ Main destinations of transregional flows and their significant origins, 2012-2014



7. Policy makers in destination countries who are interested in protecting vulnerable people groups from exploitation within their country, should understand trans-regional flow and global patterns of human trafficking. Yury Fedotov, former Executive Director of the United Nations Office of Drugs and Crime, was quoted in the 2020 Annual Trafficking in Persons Report (TIPS) as saying, “[Human Trafficking] thrives in situations where the rule of law is weak and people lack opportunities. Humanitarian crises and conflicts create an environment in which traffickers easily prey upon the vulnerable.” (Trafficking In Persons Report, 2020 p. 23) Destination countries with weak border security and lax immigration policies in effect create an open door for traffickers to enter and do business. It creates more opportunity for them to make money and in turn motivates traffickers to recruit more victims from origin countries. Put simply, traffickers would not invest the time and resources to groom, recruit and transport large numbers of potential victims to the U.S. border if they had reason to believe a crossing would not be possible. There’s no money in that.

Human Trafficking in the United States

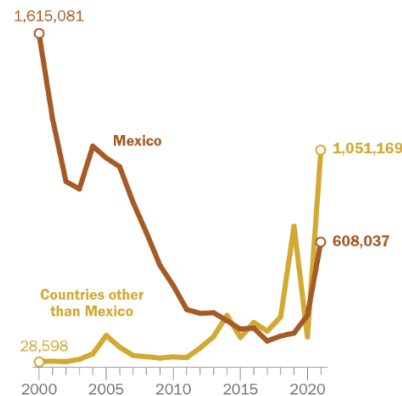
8. According to years of data collected by Polaris Project, the nation’s largest anti-human trafficking non-governmental organization and the operator of the National Human Trafficking Hotline, the majority of human trafficking victims in the United States are U.S. citizens. The affluence of the U.S., however, also makes it a destination country for victims from other countries. International criminal organizations look for weaknesses in U.S. borders and immigration policy in order to bring their victims into the country. Russian mafia, Asian organized crime, and Mexican cartels smuggle people into the United States for the purpose of human trafficking. Much of this occurs across the U.S.-Mexico border.

9. The most common origin countries for human-trafficking victims documented in 2020 were from Mexico followed by Honduras and Guatemala (*US Department of State (2020) Trafficking in Persons Report. pgs. 515-523. Retrieved from: <https://www.state.gov/wp-content/uploads/2020/06/2020-TIP-Report-Complete-062420-FINAL.pdf>*). In the years 2015-2018, 2,552 victims of human trafficking were identified by Polaris Project that related to cross US-Mexico border human trafficking activities. Of those victims, 1,535 originated from Mexico, 151 from the USA, 82 from Honduras, 76 from Guatemala, 33 from India, and 33 from El Salvador. In the same years, Polaris identified 1,782 traffickers committing cross US-Mexico border human trafficking. 380 of those traffickers originated from Mexico, 132 from the USA, 29 from Honduras, 20 from Guatemala, and 13 from India. While data on suspected traffickers committing cross US-Mexico border human trafficking is not yet available for the fiscal year of 2021, the US Border Patrol estimates 1.6 million contacts with migrants crossing the US southern border during that time period. This is four times higher than the previous year and an all time record.

10. Not all victims entering the U.S. via the southern border are Hispanic. Victims from Eastern Europe have also been smuggled into the United States via the U.S.-Mexico border by

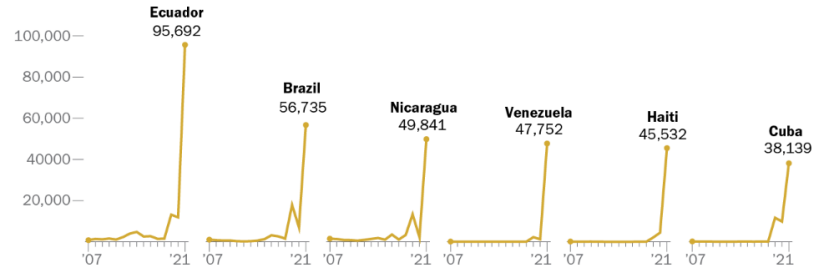
Russian mafia and other Eastern European criminal organizations. Their tactic is to disguise their victims as American students by purchasing a nice car and western clothing for their Caucasian victims as a means to ensure passage across the border. Asian organized crime also has a history of using the southern border as a means to bring in women they intend to traffic through illicit massage businesses. In 2021, there were more immigrants crossing the US southern border from countries other than Mexico than ever before (US Customs and Border Protection, 2022). Many immigrants are from countries not historically seen attempting to cross our border, like Brazil, Haiti or Cuba.

Migrant encounters at U.S.-Mexico border, by citizenship grouping and fiscal year



Note: Beginning in fiscal 2020, annual totals combine apprehensions and expulsions into a new category known as encounters. Annual totals before fiscal 2020 include apprehensions only.
Source: U.S. Customs and Border Protection.

Migrant encounters at U.S.-Mexico border, by citizenship and fiscal year



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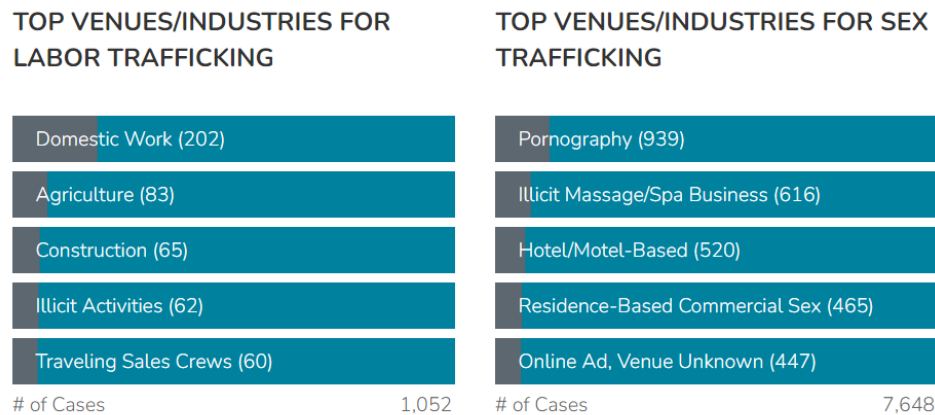
11. It is important to understand that human trafficking and human smuggling, while interconnected, are two different things. Smuggling is a crime against a nation and is something that an individual can consent to. Human trafficking, however, is a crime against an individual. As defined by law, a person cannot consent to being trafficked. Smuggling can make an individual vulnerable to traffickers in a number of ways. For example, many smuggling operations are conducted for the purpose of creating debt bondage situations or circumstances in which children are separated from their families. Many traffickers employ smugglers to transport the victims recruited in origin countries.

12. To be clear, the United States is a desirable location for human traffickers to be doing business. There is money to be made here. International organized crime groups seek to exploit loopholes in our visa system, policies about asylum, and find areas of our borders that can be physically crossed with relative ease. For example, many of the workers in the estimated 11,000 illicit massage businesses across the United States entered the U.S. in one of two ways: they were smuggled across the U.S.-Mexico border via coyotes or took advantage of loopholes in immigration policy enacted in 2012 under the Obama Administration that allowed them to claim asylum for persecution. No verification of the basis for seeking asylum is required and follow up is not provided. Thus, the victims disappeared into the United States. Many of these women are under the control of Asian organized crime groups and are being sex trafficked in illicit massage

parlors across the United States (Polaris, 2018, Human Trafficking in Illicit Massage Businesses.)

13. Foreign national victims of human trafficking are found in both labor and sex trafficking across the United States. Foreign nationals who don't speak English and are undocumented can easily be marginalized and isolated. Fear of deportation can keep victims from reporting to law enforcement. Often these victims have been told to fear law enforcement and are unaware of their rights. Unaccompanied and undocumented minors who enter the United States via smugglers are extremely vulnerable to traffickers and other abusers. There is no one to file a missing child report, or issue an Amber Alert. There is no record that the child is even here in this country. No one even knows to look. In the eyes of a trafficker, children in these circumstances make ideal victims.

14. The following graphic represents top venues for human trafficking reported to the National Human Trafficking Hotline during the year of 2020 (the latest year those statistics are available):



Source: Polaris Project (2020), Retrieved from: <https://humantraffickinghotline.org/states>

15. Unskilled labor pools are common places to find labor trafficking victims in states all across the U.S. Undocumented, marginalized immigrants are ideal candidates for these situations. Female labor trafficking victims are also often subjected to harassment and sexual abuse including sex trafficking.

- According to the International Journal of Rural Criminology (2014), 39% of North Carolina's farm workers report being trafficked or otherwise abused.
- In 2008, approximately 1,200 undocumented migrant workers were freed from slave-like conditions on tomato farms in central Florida. Victims had wages withheld, were beaten, threatened and forced to work long hours in extreme conditions. They were locked up and confined. Some of the women reported sexual abuse.
- In 2015, a Justice Department press release announced the unsealing of a 15-count superseding indictment "charging three defendants with luring Guatemalan minors and

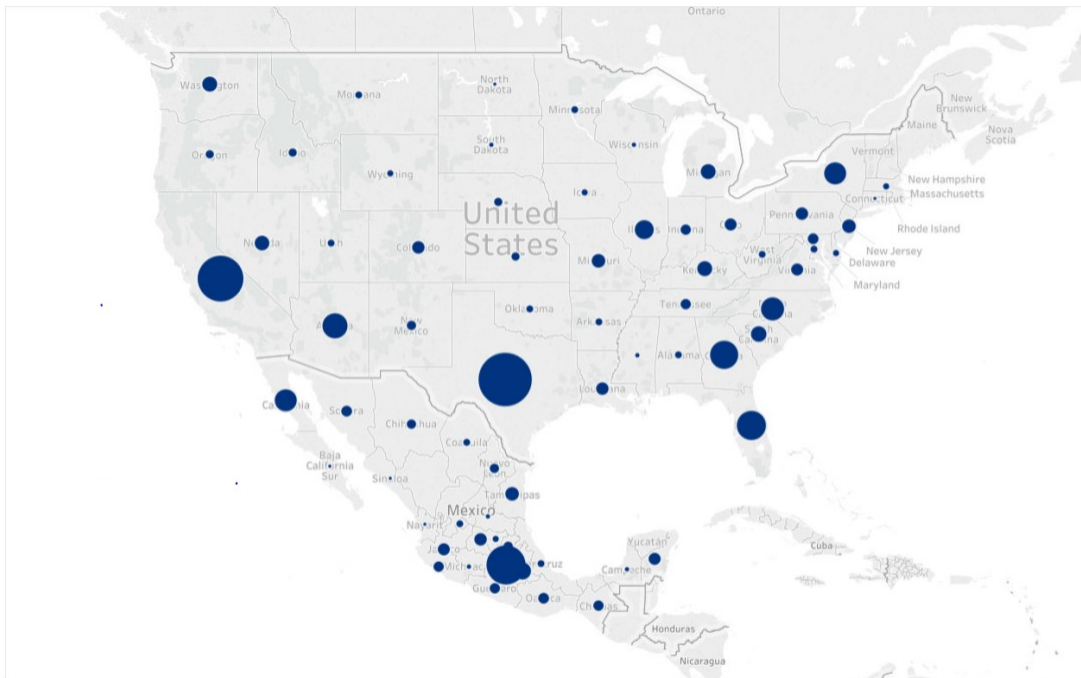
adults into the United States on false pretenses, then using threats of physical harm to compel their labor at egg farms in Ohio.”

- Other cases have involved tomato pickers locked in box trucks under armed guard and children around the age of 7 laboring in Michigan blueberry groves.

Retrieved from: <https://www.csmonitor.com/World/2015/1116/Trafficking-In-Florida-s-tomato-fields-a-fight-for-ethical-farm-labor-grows>)

16. Farley, Ugarte & Zarate (2004) document reports of residential brothels and camps that extend from San Diego all the way up to Canada where undocumented immigrant young girls and women are sold for sex. These victims entered the United States via the southern border with the assistance of coyotes who initially promised them a better life (Farley, M., Ugarte, MB., Zarate, L. 2004. Prostitution and trafficking of women and children from Mexico to the United States. *Journal of Trauma Practice*, Taylor & Francis.) One of these camps is described in a 2003 report by a physician working with migrant workers, “‘The first time I went to the camps I didn’t vomit only because I had nothing in my stomach. It was truly grotesque and unimaginable.’ Many of the girls were 9 to 10 years old. On one occasion the physician counted 35 men raping a girl for money during a single hour.” (Hernandez, A. 2003. *The Sex Trafficking of Children in San Diego: Minors are prostituted in farm labor camps in San Diego*. El Universal, Mexico City. Jan 11, 2003).

Number of Trafficking Cases by State of Exploitation



17. Humanitarian considerations are primary in our border policy. Nevertheless, there are fiscal costs to consider as well. Expenses are incurred by our federal government, but also by states for things like law enforcement; and other criminal justice system resources, social service

costs, the public health system as well as opportunity costs should be considered. Labor trafficking results in lost wages and tax revenue and puts downward pressure on wages in general, especially in unskilled labor pools. This further exacerbates the economic challenges for individuals working in those areas of the economy which often impacts increased demand for assistance with housing and food. The money made through human trafficking by international organized criminal organizations operating in the United States further empowers these entities and contributes to an increase in crime in general. All of this has a very real price tag to it. In 2016, the University of Texas and published a report estimating the prevalence of child sex trafficking and labor trafficking in Texas and the associated financial cost to the state. Key findings of this report estimate that approximately 79,000 minors were being sex-trafficked in Texas at any given time during that year. The lifetime social service costs incurred by the state and the victims themselves through mental and physical health costs, strains to the public health system, and law enforcement expenses is estimated to be \$6.6 billion dollars. The study additionally estimates the annual value of lost wages for labor trafficking victims to be approximately \$600 million dollars. (Source retrieved from: <https://globalinitiative.net/wp-content/uploads/2018/01/Human-trafficking-by-the-numbers.pdf>)

18. In conclusion, the data presented indicates there is a relationship between the prevalence of human trafficking in the United States and activity on the US-Mexico border. Immigration policies as they relate to the management of the southern border of the United States are a contributing factor to overall rates of human trafficking in the United States. Cross border trafficking is not the largest cause of overall human trafficking in the United States, as the majority of human trafficking cases within the United States originate domestically. Nevertheless, cross border human trafficking activity has implications for the overall prevalence of human trafficking in all fifty states, not just the states along the U.S. Mexico border.

Missouri

19. For the three years 2017 through 2019, between 9% and 12% of calls made to the National Human Trafficking Hotline for the state of Missouri involved foreign nationals. It is my professional opinion, based on my study of relevant research and my work in the field, that what is reported to the National Human Trafficking Hotline are just the proverbial “tip of the iceberg.” The vast majority of cases of human trafficking are not identified or reported at all, this is especially true for cases in which the victims are foreign nationals. Most of these victims are very isolated and marginalized by physical, geographical, cultural and linguistic factors. They, like many human trafficking victims, do not self-identify as victims, do not know their rights, and do not know who or how to ask for help.

20. Several recent sample cases of human trafficking involving foreign nationals who were able to gain entry into the United States due to weaknesses in immigration policy and then were exploited in or through Missouri are provided in the following section. They detail the ways in which lax immigration policy and open borders create opportunities for traffickers. Once victims arrive in the United States, they do not just stay in the bordering states of California, Arizona,

New Mexico and Texas. Cases involving human trafficking of foreign nationals are documented in all fifty states.

21. In 2014, an 80% increase in unaccompanied minors at the U.S. Mexico border was reported. This increase is attributed to several factors, including a change in policy regarding the potential deportation for undocumented immigrants who were minors. Accompanying that change in policy was a marked increase in smugglers' recruitment in origin countries. (Robertson, Lori (2018-06-28). *"Illegal Immigration Statistics"*). As Director of our state HTTF, I have the opportunity to work with numerous social service and law enforcement agencies across the state. A veteran state Trooper with over two decades of experience on Missouri highways recounted for me how in 2014, he saw a marked increase in activity on our highways involving foreign nationals. Some of that activity he suspects involved human trafficking.

22. Missouri can be a destination or transit state for many human traffickers. This is mainly due to the state's substantial transportation infrastructure, major population centers and various aspects of our economy that are reliant on unskilled labor such as agriculture. Missouri has the 7th largest highway system in the nation with six major interstates. Coupled with its geographical middle location in the country, this ensures that a significant portion of transnational movement passes through Missouri.



Source: Missouri Department of Economic Development (2021). Retrieved from: <https://ded.mo.gov/transportation-and-logistics/why-missouri/centrally-located-with-excellent-infrastructure>

Case Examples

An Unaccompanied Three Year Old Girl

23. On December 22, 2020, a Kansas Highway Patrol Technical Trooper conducted a traffic stop on U-54 Hwy in SW Kansas. The vehicle was full of illegal immigrants. The trooper observed 9 males and 1 female and wanted to check the welfare of the female to make sure that she was not being trafficked. During the traffic stop, it came to light that there was a small female child in the vehicle. The trooper re-approached and eventually discovered that the 3 year old female from Ecuador was concealed under the rear bench seat and covered with a blanket. Further investigation revealed that the child was not related to anyone in the vehicle. Further, her parents had her smuggled across the U.S.-Mexico border in one fashion and they were going to attempt to cross utilizing a different method. The parents didn't make it across. However, they had sent the girl with a phone and some phone numbers to contact if this scenario happened. The driver stated he picked the child up in Albuquerque, NM at a gas station from a different vehicle. He admitted he was taking the child to Chicago [via Missouri]. The parents had planned to arrive in New York to live with family. The driver didn't know why the girl was going to Chicago or whether she would end up in New York or not. He was being paid to transport these immigrants.

24. The girl was removed from the situation and family in New York was contacted. No one had heard from this girl in the six days since she crossed the border. Two days later, the family members from New York arrived to take custody of the girl.

25. This traffic stop came five days after some human trafficking/sex offender training that the Missouri State Highway Patrol provided to this trooper and other members of the Kansas Highway Patrol.

(Source: Personal Communication (April 2, 2021). Kansas Highway Patrol)

26. As task force director, I am aware of children in situations like this, especially very young ones, being sexually exploited in residential brothels and through websites that specialize in producing child sexual abuse material (CSAM) (also referred to as child pornography). There is a very specific niche market for CSAM featuring very young children with subscribers who are willing to pay high dollar to access. Some of these websites require subscriptions where a viewer can pay for customized sessions where they can request specific acts to be done to the child while the viewer watches live. The website platforms that participate in this horrible practice often use children from developing countries with unstable governments where they have reasonable assurance that there will be no law enforcement involvement. Children who are unaccompanied and undocumented in the United States are ideal potential victims for this form of horrific abuse as well.

A Pregnant 12 Year Old Girl From Honduras

27. In the summer of 2021, a nurse at a Missouri area hospital provided treatment to a 12 year old girl from Honduras. The girl was pregnant by an adult male and had several indicators of trafficking and/or exploitation. Because they were undocumented, the girl's mother had been reluctant to seek medical treatment for the child or report to police. The nurse did make a police report, however local police resources have become so limited that proper follow up and investigation was not provided.

(Source: Personal Communication. (June, 2021) Anonymous Nurse)

28. When I tried to follow up with the sergeant who received this report just four days later, he apologized to me for not being able to readily recall the situation, because in his words, "We're so overrun with stuff like this". To our knowledge, this girl has not received services and there has been no investigation or arrests made.

29. Being undocumented creates a vulnerability that traffickers and other exploiters routinely exploit. They know victims fearing deportation will be reluctant to seek medical care and will rarely ever report to police. There is no record of these victims even being in our country and so they make ideal victims. At the same time that we are seeing a sharp increase in the number of these vulnerable people in the US, we are also experiencing a decline in available law enforcement resources and health care workers. In other words, the rise in illegal immigration is creating more work for our law enforcement and health care workers at the same time that we have fewer people in those professions available to do it. The net result is that more vulnerable people suffer and tax payers foot the bill.

An 11 Year Old Girl in Lingerie

30. In the fall of 2021, an 11 year old girl from Central America sought treatment at a Missouri hospital after being raped. The nurse who made a report to law enforcement recognized several indicators of trafficking and/or exploitation. During the exam, the nurse also noted that the child was wearing lingerie and had sent thousands of nude photos of herself to adult men on her phone. Even though this child had been raped multiple times, the family was reluctant to seek medical care or make a report to police, because they were undocumented.

(Source: Personal Communication. (October, 2021) Alison Phillips. Anonymous Nurse)

31. In this case, it should also be noted that due to lack of resources law enforcement has not followed up and initiated an investigation. The expenses for her medical care will ultimately be realized through increased costs in medical care for all.

A Broken Down Semi Truck in Oklahoma

32. An Oklahoma news affiliate in March of 2022 reported a story detailing the events surrounding a broken down semi truck in McLean County. The semi pulled over and was surrounded by several SUV's containing adult Hispanic males. The semi truck driver then left the scene in one of the SUV's. Men from a nearby business heard cries for help coming from the trailer and opened the back. Inside were approximately 50 Hispanic children between the ages of 10 and 16 who said they had been in the tractor trailer for over 20 hours. They were fearful and had been malnourished and beaten. Seven of the children were rescued when law enforcement was called. The other children disappeared when the men in the SUV's returned to the scene. An investigation into human trafficking has been initiated as a result of this incident.

(Source: Oklahoma News 4 KFOR (March, 2022)
<https://www.youtube.com/watch?v=T88Iw9EURko>)

Labor Trafficking in the Kansas City Area

33. In 2016, the owners and crew leaders of a company named Century Roofing were found to be involved in labor trafficking of undocumented immigrants. The federal indictment alleges that the workers were threatened, intimidated, and coerced into paying kickbacks to the company and its managers. Workers were housed in over-crowded apartments, and threatened with deportation if they did not work long hours and pay money back to supervisors. Further investigation indicated that Century Roofing helped facilitate the recruitment and transportation of their victims for the purpose of providing below market wages. Three arrests were made.

Retrieved from: <https://fox4kc.com/news/3-arrested-in-kck-on-criminal-charges-following-homeland-security-investigation/>

Labor Trafficking in the Branson Area

34. In 2009, a labor leasing company named Santa Cruz Management, was found to be hiring foreign nationals who had been trafficked into the United States utilizing loopholes in the U.S. H-2B Visa system. The company sent recruiters to countries like Belize and the Philippines to find workers to fill their positions, knowing there were weaknesses in the H-2B Visa system that could be used to facilitate their entry into the U.S. Workers agreed to incur a debt that they believed could later be paid off once they started working. The labor company would help facilitate travel, and provided assistance with circumventing the immigration process by telling them how to lie to immigration officials. Victims were then forced violate the terms of their visas, housed in overcrowded apartments and hotel rooms, and threatened with deportation. The victims were employed as landscapers, housekeepers and worked in restaurants in the Branson Area.

35. This case is a classic example of how the tactic of utilizing debt bondage is a common means to control labor trafficking victims and exploit them for their wages. Many victims make substandard wages, but even those who make minimum wage can then be forced, coerced or

tricked into paying all or most of that back to the company as a means to pay of that debt. Traffickers will continue to find ways to add to this contrived debt as a means to continue control and make money. An important aspect of this story to keep in mind is that were it not for weaknesses in our immigration system, be it loopholes in our Visa system or a physical opening in a border where crossing is permissible, traffickers would not invest in recruiting, transporting and harboring of victims in the first place.

Retrieved from: <https://www.hoppocklawfirm.com/a-branson-human-trafficking-scheme-and-its-hopeful-aftermath/>

Multi State Labor Trafficking Case

36. In 2009, eight individuals from Uzbekistan were charged with racketeering, forced labor trafficking, immigration violations. They owned and operated three labor leasing companies that primarily was looking to hire house cleaners for hotels across 14 states including Missouri, specifically in the Kansas City and Branson areas. The workers were largely undocumented immigrants who entered via the southern U.S.-Mexico border or had overstayed their visas. They were controlled by debt bondage tactics in which sometimes worker would receive paychecks with negative earnings and threats of physical violence and abuse and threat of deportation. The indictment also included violations related to identity theft, harboring illegal aliens, mail fraud, conspiracy to commit money laundering, transporting illegal aliens, visa fraud, extortion, interstate travel in aid of racketeering, wire fraud and inducing the illegal entry of foreign nationals.

Retrieved from: <https://www.justice.gov/opa/pr/eight-uzbekistan-nationals-among-12-charged-racketeering-human-trafficking-immigration>

37. In sum, a significant increase in the levels of illegal immigration across the southern border, as is expected from the termination of the Title 42 policy, will lead to an increase in human-trafficking across the southern border, which will injure the trafficking victims and impose financial costs on States, including Missouri.

I swear or affirm under penalty of perjury that the foregoing is true and correct.

Dated: April 8, 2022

A handwritten signature in black ink, appearing to read "Alison Phillips". The signature is written in a cursive, flowing style with a large initial 'A' and 'P'.

Alison Phillips